

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

COUNTRY MUTUAL INSURANCE  
COMPANY as successor to HOLYOKE  
MUTUAL INSURANCE COMPANY a/s/o  
LAKERIDGE VILLAS HOMEOWNERS  
ASSOCIATION.

Case No.: 3:19-cv-00463-LRH-WGC

Plaintiff.

vs.

TYANNE ELLIS-GUN,

Defendant.

**VERIFIED PETITION FOR PERMISSION TO PRACTICE IN THIS CASE ONLY BY  
ATTORNEY NOT ADMITTED TO THE BAR OF THIS COURT AND DESIGNATION  
OF LOCAL COUNSEL**

Daniel J. de Luca Esq., Petitioner, respectfully represents to the Court:

1. That Petitioner is an attorney at law and a member of the law firm of de Luca Levine, LLC with offices at Three Valley Square, Suite 220, Blue Bell, PA 19422. Telephone number: (215) 383-0081 and email address of [ddeluca@delucalevine.com](mailto:ddeluca@delucalevine.com).

2. That Petitioner has been retained personally or as a member of the law firm of de Luca Levine, LLC to provide legal representation in connection with Country Mutual Insurance Company in the above-entitled case now pending before this Court.

1           3. That since 1994, Petitioner has been and presently is a member in good standing of  
2 the bar of the highest Court of the State of Pennsylvania where Petitioner regularly practices law.  
3 Petitioner shall attach a certificate from the state bar or from the clerk of the Supreme Court or  
4 highest admitting court of each state, territory, or insular possession of the United States in which  
5 the applicant has been admitted to practice law certifying the applicant's membership therein is in  
6 good standing.

7           4. That Petitioner was admitted to practice before the following United States District  
8 Courts, United States Circuit Courts of Appeal, the Supreme Court of the United States and Courts  
9 of other States on the dates indicated for each, and that Petitioner is presently a member in good  
10 standing of the bars of said Court:

<i>Court</i>	<i>Date Admitted</i>	<i>Bar Number</i>
<u>Pennsylvania</u>	<u>1994</u>	<u>74727</u>
<u>New Jersey</u>	<u>1994</u>	<u>038451994</u>
<u>U.S. District Court of NJ</u>	<u>12/30/1994</u>	
<u>U.S. District Court- ED PA</u>	<u>1/24/1996</u>	

16           5. That there are or have been no disciplinary proceedings instituted against Petitioner,  
17 nor any suspension of any license, certificate or privilege to appear before any judicial, regulatory  
18 or administrative body, or any resignation or termination in order to avoid disciplinary or  
19 disbarment proceedings, except as described in detail below:  
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23           6. That Petitioner has never been denied admission to the State Bar of Nevada. (Give  
24 particulars if ever denied admission):  
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1           7. That Petitioner is a member of good standing in the following Bar Associations:

2           (State "none" if Petitioner is not a member of other Bar Associations.)

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5           8. Petitioner has filed application(s) to appear as counsel under Local Rule IA 10-2  
6 during the past three (3) years in the following matters:

7 Date of Application	8 Cause	9 Title of Court Administrative Body or Arbitrator	10 Was Application Granted or Denied
11 _____	12 _____	13 _____	14 _____
15 _____	16 _____	17 _____	18 _____
19 _____	20 _____	21 _____	22 _____
23 _____	24 _____	25 _____	26 _____
27 _____	28 _____		

16           (If necessary, please attach a statement of additional applications)

17           9. Petitioner consents to the jurisdiction of the courts and disciplinary boards of the  
18 State of Nevada with respect to the law of this state governing the conduct of attorneys to the same  
19 extent as a member of the State Bar of Nevada.

20           10. Petitioner agrees to comply with the standards of professional conduct required of  
21 the members of the bar of this court.

22           11. Petitioner has disclosed in writing to the client that the applicant is not admitted to  
23 practice in this jurisdiction and that the client has consented to such representation.

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1           That Petitioner respectfully prays that Petitioner be admitted to practice before this Court  
2 FOR THE PURPOSES OF THIS CASE ONLY.

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Petitioner's Signature

STATE OF PENNSYLVANIA        )  
                                      )  
COUNTY OF MONTGOMERY        )

8           Daniel J. de Luca, Esq., Petitioner, being first duly sworn, deposes and says: That the  
9 foregoing statements are true.

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Petitioner's Signature

13           Subscribed and sworn to before me this  
14           5 day of December, 2019.

Commonwealth of Pennsylvania - Notary Seal  
Courtney Scrivner, Notary Public  
Montgomery County  
My commission expires August 30, 2023  
Commission number 1288191

16             
17 Notary public or Clerk of Court

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1                   **DESIGNATION OF RESIDENT ATTORNEY ADMITTED TO THE BAR OF THIS**  
2                   **COURT AND CONSENT THERETO.**

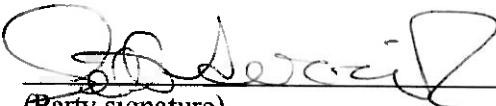
3                   Pursuant to the requirements of the Local Rules of Practice for this Court, the Petitioner  
4                   believes it to be in the best interests of the client(s) to designate Tye S. Hanseen, Esq., Attorney  
5                   at Law, member of the State of Nevada and previously admitted to practice before the above-  
6                   entitled Court as associate residence counsel in this action. The address of said designated  
7                   Nevada counsel is:

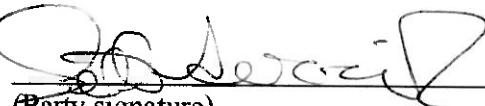
8  
9                   10001 Park Run Drive  
10                   Las Vegas, Nevada 89145  
11                   (702) 382-0711

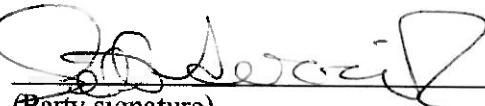
12  
13                   By this designation the Petitioner and undersigned party(ies) agree that this designation  
14                   constitutes agreement and authorization for the designated resident admitted counsel to sign  
15                   stipulations binding on all of us.

16                   **APPOINTMENT OF DESIGNATED RESIDENT NEVADA COUNSEL**

17                   The undersigned party(ies) appoints Tye S. Hanseen, Esq. as their Designated Resident  
18                   Nevada Counsel in this case.

19  
20                     
21                   (Party signature)

22                     
23                   (Party signature)

24                     
25                   (Party signature)

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## **CONSENT OF DESIGNEE**

The undersigned hereby consents to serve as associate resident Nevada counsel in this case.

/s/ Tye S. Hanseen, NV Bar No. 10365

Designated Resident Nevada Counsel's Signature Bar number

**APPROVED:**

DATED this 9th day of December, 2019.

LARRY R. HICKS  
UNITED STATES DISTRICT JUDGE



Supreme Court of Pennsylvania

**CERTIFICATE OF GOOD STANDING**

*Daniel J. de Luca, Esq.*

**DATE OF ADMISSION**

*December 15, 1994*

The above named attorney was duly admitted to the bar of the Commonwealth of Pennsylvania, and is now a qualified member in good standing.



Witness my hand and official seal  
Dated: November 15, 2019



Patricia A. Johnson  
Chief Clerk

# Supreme Court of New Jersey



## Certificate of Good Standing

*This is to certify that* **DANIEL JOSEPH DE LUCA**  
(No. **038451994**) *was constituted and appointed an Attorney at Law of New*  
*Jersey on* **December 19, 1994** *and, as such,*  
*has been admitted to practice before the Supreme Court and all other courts of this State*  
*as an Attorney at Law, according to its laws, rules, and customs.*

*I further certify that as of this date, the above-named is an Attorney at Law in Good Standing. For the purpose of this Certificate, an attorney is in "Good Standing" if the Court's records reflect that the attorney: 1) is current with all assessments imposed as a part of the filing of the annual Attorney Registration Statement, including, but not limited to, all obligations to the New Jersey Lawyers' Fund for Client Protection; 2) is not suspended or disbarred from the practice of law; 3) has not resigned from the Bar of this State; and 4) has not been transferred to Disability Inactive status pursuant to Rule 1:20-12.*

*Please note that this Certificate does not constitute confirmation of an attorney's satisfaction of the administrative requirements of Rule 1:21-1(a) for eligibility to practice law in this State.*



*In testimony whereof, I have  
hereunto set my hand and  
affixed the Seal of the  
Supreme Court, at Trenton, this  
day of*

*19TH November , 2019*

*Heather J. Baler*  
Clerk of the Supreme Court